

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS – MINNESOTA, LEAGUE OF
WOMEN VOTERS OF MINNESOTA,

Plaintiffs,

v.

ATLAS AEGIS LLC, ANTHONY CAUDLE,
JOHN DOES #1-10,

Defendants.

Civil Action No. 0:20-cv-02195

DECLARATION OF JULIA DAYTON KLEIN

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am a partner at Lathrop GPM LLP, counsel to Plaintiffs in this action. I am over age 18 and competent to make this declaration. The facts set forth in this Declaration are based on my personal knowledge. I would testify to these facts in open court if called upon to do so.

This Declaration is submitted in support of Plaintiffs’ Motion for Preliminary Injunction.

2. Attached hereto are true and complete copies of the following exhibits cited in Plaintiffs’ memorandum of law in support of their application for a preliminary injunction:

- a. Exhibit 1 is a true and complete copy of a Press Release published on the official website of the Office of Senator Amy Klobuchar on October 13, 2020, titled “Klobuchar Denounces Rushed Supreme Court Nomination Process, Presses Judge Barrett on Voting Rights During Second Day of Hearings.” It is available at <https://www.klobuchar.senate.gov/public/index.cfm/news-releases?ID=5A622DB2-CAD6-47CA-A8AF-B57B63FAC310>.

- b. Exhibit 2 is a true and complete copy of a report by Joshua Paltrow in The Washington Post, published on October 9, 2020, titled “Former Special Forces sought by private security company to guard polling sites in Minnesota, company says.” It is available at https://www.washingtonpost.com/politics/private-security-minnesota-election/2020/10/09/89766964-0987-11eb-991c-be6ead8c4018_story.html.
- c. Exhibit 3 is a true and correct copy of a screen capture of an advertisement placed on Facebook by Atlas Aegis, captured on October 9, 2020. It has since been deleted or otherwise hidden.
- d. Exhibit 4 is a true and correct copy of an advertisement placed on the Marine Executive Association website. It is available at <https://www.marineea.org/hotjobs/job/armed-security-for-november-elections-and-post-election-support-missions-mspmminnesolta-poc-in-listing/>.
- e. Exhibit 5 is a true and correct copy of an article from “Soldier of Fortune” magazine feature Atlas Aegis Chief Operating Officer Michael Beltran, dated December 24, 2019.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on October 20, 2020 at Minneapolis, Minnesota

s/ Julia Dayton Klein
JULIA DAYTON KLEIN